

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

WILMER RUBEN ESPINAL)
ALVARADO,)
Petitioner,)
v.) C.A. No. 20-10685-ADB
ANTONE MONIZ, Superintendent of the)
Plymouth County Correctional Facility,)
Respondent.)

)

**NOTICE OF EMERGENCY AMENDED PETITION FOR WRIT OF HABEAS CORPUS
AND INJUNCTIVE RELIEF**

Consistent with Federal Rule of Civil Procedure 15(a), petitioner Wilmer Ruben Espinal Alvarado, through undersigned counsel, has filed an amended petition in this action.

This action was filed by 65 immigration detainees at the Plymouth County Correctional Facility. During the current pandemic, undersigned counsel cannot be separately engaged by 65 new clients, particularly given current restrictions on movement, visitation, and communication with detainees.

However, undersigned counsel have now been engaged by one of the petitioners, Mr. Espinal Alvarado, for purposes of this action. Counsel are consequently submitting evidence and legal argument into the record of this action. Although this information is being submitted on Mr. Espinal Alvarado's behalf, counsel respectfully suggest that the evidence and argument, which is now part of the record, may aid the Court in its consideration of the other 64 claims. If the Court determines that this amended petition should be severed into a separate action and

assigned a separate docket number, counsel respectfully suggest that treating such action as in some fashion consolidated with or related to the existing action may serve the interests of justice and judicial economy.

To be clear, this amendment is filed for Mr. Espinal Alvarado only, and does not modify, supersede, or dismiss any claims brought by the other 64 petitioners.

Dated: April 13, 2020

/s/ Daniel L. McFadden

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*pro hac application forthcoming

**pro hac application forthcoming; not admitted in D.C.; practice limited to federal courts